



January 19, 2010 / Revised September 24, 2010

JN: 25-103821.001

County of San Diego
Department of Planning and Land Use
c/o Paul Dawson, County Fire Marshal
5201 Ruffin Road, Suite B
San Diego, CA 92123

Borrego Springs Fire Protection District
c/o John Hardcastle, Fire Chief
2324 Stirrup Road
Borrego Springs, CA 92004-0898

**SUBJECT: FIRE PROTECTION PLAN – LETTER REPORT
EE BORREGO LAND, LLC – PHOTOVOLTAIC SOLAR FARM
MUP 09-012 AND 09-014; ER NO. 09-05-001-RPL2
APN'S: 141-230-26-00 AND 141-230-33-00**

Dear Mr. Dawson and Mr. Hardcastle:

This Fire Protection Plan (FPP) – Letter Report is being submitted pursuant to Chapter 47 of the County Fire Code as an evaluation of the adverse environmental effects that a proposed project may have from wildland fire and as mitigation of those impacts to ensure that the above referenced Project does not unnecessarily expose people or structures to a significant risk of loss, injury or death involving wildland fires.

PROJECT DESCRIPTION

The proposed Project would result in the construction, operation and maintenance of a photovoltaic (PV) solar farm within the community of Borrego Springs, California in northeastern San Diego County. Eurus Energy America Corporation's wholly owned subsidiary, EE Borrego Land, LLC (herein referred to as Eurus Energy) proposes to develop such facilities to allow for the long-term generation of clean energy from solar power that would ultimately be sold and distributed for public consumption.

The Project would consist of solar generation facilities on two individual parcels of land, with additional lands affected to allow for the transport of power generated to the existing Borrego Substation. The County Assessor Parcel Numbers (APNs) affected by the proposed Project for the main facilities include 141-230-26 (approximately 288 acres) and a portion of 141-230-33 (approximately 53 acres).

The facilities will consist of an array of fixed-tilt, non-tracking solar PV panels, inverter/switching gear housed in 38 12-foot by 26.5-foot structures, one 20-foot by 30-foot storage shed, two onsite substations, and supporting transmission facilities. Energy generated will be transferred to the existing Borrego Substation, located approximately one mile to the west of the 288-acre parcel, adjacent to Borrego Valley

PLANNING ■ DESIGN ■ CONSTRUCTION

9755 Clairemont Mesa Boulevard, Suite 100, San Diego, CA 92124 ■ 858.614.5000 ■ Fax 858.614.5001

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Road, via a series of overhead transmission lines. The transmission lines will extend from the 288-acre parcel to the Borrego Substation along one of two identified routes: 1) west from the northwesterly corner of the parcel within an existing 20-foot easement maintained by San Diego Gas and Electric (SDG&E) (overhead facilities); or, 2) south from the southwesterly corner of the parcel along the existing access road to Palm Canyon Drive (underground), west along Palm Canyon Drive (overhead), then north along Borrego Valley Road (overhead). Access to the 53-acre lease parcel and 288-acre parcel will be provided from Palm Canyon Drive via an existing 12- to 16-foot wide decomposed granite (DG) access road. It is anticipated that construction will begin in the fall of 2010 with construction of all phases being completed in 2011.

ENVIRONMENTAL SETTING

1. Location: The land areas that comprise the Project site are located just east of the community of Borrego Springs, California, within northeastern San Diego County; refer to Figure 1, Regional / Local Vicinity Map, and Figure 2, Aerial Photograph. The land that would be developed with the Project would affect two main parcels, with additional lands affected to support the transmission of power generated to the existing Borrego Substation, located just east of Borrego Valley Road. The County APNs that comprise the Project area for the main facilities are 141-230-26 (approximately 288 acres) and a portion of 141-230-33. Parcel 141-230-33 totals approximately 104 acres; however, only approximately 53 acres of this parcel would be included in the Project. The remaining (approximately) 51 acres would remain undisturbed and would not be leased by the Project proponent. The 53-acre portion included in the Project would be leased by EE Borrego Land, LLC or an affiliated company, from the County of San Diego, Department of Public Works, Airport Division to support the intended facilities (refer to Figure 2, Aerial Photograph). EE Borrego Land, LLC, currently has purchase options on APN 141-230-26 and an executed option to negotiate a final lease agreement with the County of San Diego, the owner of APN 141-230-33. Palm Canyon Drive runs east-west to the south of the two parcels, with Borrego Valley Road running just west of the existing Borrego Substation. The Borrego Valley Airport borders the southern border of the approximate 53-acre lease area.

2. Topography: The overall topography is generally descends gradually from northwest to southeast across the region. Although the topography of the Project area is generally flat, there are a series of low dune ridges with hummocky areas throughout. Elevations range from approximately 519 feet above mean sea level (amsl) to 538 feet amsl on the 53-acre lease parcel and approximately 529 feet amsl to 554 feet amsl on the 288-acre parcel.

3. Geology: The Project area and the Borrego Valley in general are underlain by Quaternary alluvium. The vast majority of the Project area is mapped as Indio silt loam, 0 to 2 percent slopes; and Indio silt loam, saline, 0 to 2 percent slopes; with pockets of Rositas fine sand, 0 to 2 percent slopes; and, Rositas fine sand, hummocky, 5 to 9 percent slopes. There is no evidence of geological features that would pose any increased danger of wildfire potential or human safety issues.

4. Flammable Vegetation: Vegetation in Borrego Springs largely consists of Low Lying Desert Saltbush Scrub and Stabilized and Partially Stabilized Desert Dunes, with sparse groundcover consisting of a mixture of Mediterranean grass and mustard. Soil types found in the affected region also generally support bur-sage, saltbush, and annual grasses and forbs. Some native wildflower species occur intermittently, with a number of dead mesquite trees also present in various onsite locations on the parcels. Given the sparseness of vegetative clusters, the fire hazard levels are minimal.

5. Climate: The climate in Borrego Springs is very hot during summer with temperatures in the upper 90's and at times reaching into the 100's. Winter temperatures tend to dip into the 50's and even cooler over

nighttime hours. The warmest month of the year is July with an average maximum temperature of 99 degrees Fahrenheit, while the coldest month of the year is January with an average minimum temperature of 43 degrees Fahrenheit. Temperature variations between night and day tend to be relatively big during summer with a difference that can reach 32 degrees Fahrenheit, and moderate during winter with an average difference of 26 degrees Fahrenheit. The annual average precipitation at Borrego Springs is 6.91 inches. Rainfall is fairly evenly distributed throughout the year. The wettest month of the year is January with an average rainfall of 1.43 inches.

PROJECT EXPOSURE TO WILDLAND FIRES

1. Water Supply: To allow for ongoing maintenance of the solar panels, connection to the public water system is proposed. The Project would connect to an existing 10-inch water line in Palm Canyon Drive and would extend the line to the southwest corner of the 53-acre-lease parcel. A private line would then be extended within the interior of the site to the onsite storage building. A private fire hydrant would be installed at the southwest corner of the 53-acre parcel.

A copy of the Water and Fire Service Availability Forms are attached to this FPP – Letter Report as Exhibit “A.”

The hydrant will be located along the roadway (all-weather surface roadway) at the entrance of the 53-acre lease parcel. The hydrant will meet the operational needs of the proposed Project pursuant to the County Consolidated Fire Code.

2. Fire Access Roads: Access to the 53-acre lease/288-acre parcels would be provided from Palm Canyon Drive via an existing access road that extends north to the western boundary of the 53-acre lease parcel. The access road is approximately 1,200 feet in length with no horizontal or vertical curves. The existing access road ranges from 12 to 16 feet in width and is surfaced with an all-weather DG material. The Borrego Springs Fire Protection District (BSFPD) has accepted the existing access as providing adequate emergency access to the both the 53-acre and 288-acre sites with mitigation of a hydrant as shown on the Plot Plan. The County Fire Marshal concurs with the local fire authority’s determination.

Access to Multiple Evacuation Routes: Interior access would be provided by a looped 24-foot wide perimeter fire access road. The looped road would be surfaced with DG and would serve as a fire buffer. On the 53-acre lease and 288-acre parcels, internal dirt roadways, approximately 24 feet in width, would be provided along the north-south access approximately every 300 feet between the east-west running rows of PV panels (approximately 150 feet to either side), per design requirements of the San Diego County Fire Marshal.

Dead Ends: No dead-end roadways are proposed.

Width: The improved width of the access looped perimeter road(s) would be 24 feet with a decomposed granite base suitable for travel by 75,000-lb. fire apparatus.

Vertical Clearance: A minimum vertical clearance of 13’-6” shall be maintained at all times along the access driveways including brush/tree maintenance in conjunction with the County Fire Code. Currently, there are no vertical obstructions along the access road.

Grade: A maximum 1% grade will be maintained along all access roads.

Surface: Surface improvements shall consist of a natural and all-weather DG material designs and shall be constructed and approved by the County of San Diego and Borrego Springs Fire Protection District. All DG material shall be compacted per County standards suitable for travel by 75,000-lb. fire apparatus.

Gates: A gate is proposed near the southwestern corner of the 53-acre parcel to provide secured access to the Project site. The gate will meet the County Fire Code Section 96.1.503.6 for automatic operation with battery back-up. The gate would open immediately upon emergency vehicle strobe light activation from either direction of approach and would include a Know key-operation switch.

3. Setback from Property Lines: The minimum setbacks as regulated by the County of San Diego Zoning Ordinance Section 4800 will be maintained. A schedule summarizing the specific zoning designation for each property is as follows

ZONING

ZONE		A	B
APN:		141-230-26	141-230-33
MUP:		09-012	09-014
USE REGULATIONS		S92	RR25
NEIGHBORHOOD REGULATIONS		W	H
DEVELOPMENT REGULATIONS	DENSITY	0.25	0.25
	LOT SIZE	4AC	4AC
	BUILDING TYPE	C	C
	MAXIMUM FLOOR AREA	--	--
	FLOOR AREA RATIO	--	--
	HEIGHT	G	G
	LOT COVERAGE	--	--
	SETBACK	D	C
	OPEN SPACE	--	--
SPECIAL AREA REGULATIONS		--	--

The entire Project site perimeter would be covered by a 30-foot wide Limited Building Zone (LBZ) and fire access road. Several onsite areas within the development would be preserved as dedicated preserved open space. The total amount of preserved open space would consist of approximately 17 acres and is intended to protect archaeological and biological resources.

NOTE: A 50-foot buffer is included in the preserved open space area. The site does not contain national forests, open space preserves, or designated riparian areas.

4. Building Construction: Building construction for on-site structures will be limited to non-combustible construction primarily of concrete, block or steel. Project structures will consist of 38 inverters spread throughout the site to conduct the Direct Current obtained from the PV units into Alternating Current, which would then be transferred from the inverters via underground gathering lines to the Project substations. Other structures would consist of two control rooms located in the substations and a 600 square foot storage building.

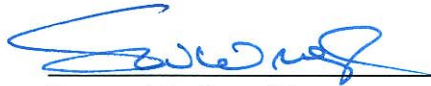
5. Fire Protection Systems: There are no full-time habitable structures located on the site, and none are proposed with the Project. One fire-hydrant located at the southwest corner of the 53-acre lease parcel will be installed per the request of the Fire Marshall.

6. Defensible Space: No defensible space is proposed for the Project; however, a 30-foot perimeter buffer defensible space will be constructed around each of the parcels and classified as a LBZ. Furthermore, there will be a 24-foot DG all-weather access road within the 30-foot LBZ to allow for fire/emergency apparatus to navigate the site.

7. Vegetation Management: On-site vegetation will be maintained/weed-whipped yearly unless otherwise requested by the County of San Diego or the Borrego Springs Fire Protection District. A minimum of 30-foot clearance will be maintained around the perimeter of the subject properties. The LBZ shall be

maintained year-round by the Project proponent as required by this FPP Letter Report and local fire regulations (BSFPD). Vegetation shall be annually maintained free of dead material.

8. Fire Behavior Computer Modeling: Based on preliminary evaluation by the County Fire Marshal, Computer Fire Behavior Modeling is not required for this FPP – Letter Report.



Prepared By Steve Wragg

9/24/2010

Date

STEVE WRAGG, VICE PRES.

Printed Name, Title

Property Owner (Signature)

Date

Printed Name, Title

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Borrego Springs Fire Protection District

P.O. Box 9 • 2324 Stirrup Road • Borrego Springs, California 92004-0898

Phone: (760) 767-5436 • Fax (760) 767-5193

October 10, 2009

Dept. of Planning and Land Use
Patrick Brown Project Manager
5201 Ruffin Rd., Suite "B"
San Diego, CA 92123-1666

Re: Eurys Energy Solar Farm; MUP 09-012, 09-013, 09-014

Location: Palm Canyon Drive and Borrego Valley Road, Borrego Springs CA.
APN: 141-210-24-00, 141-230-26-00, 141-230-33-00

Fire Agency Conditions

1. **Access** (APN: 141-230-26 and 33): The driveway (fire apparatus access road) leading from Palm Canyon Drive to the main project site entrance shall have an unobstructed improved width of not less than 24' graded road width with a decomposed granite 20' improved surface. Fire apparatus access roads shall be designed and maintained to support the imposed load of fire apparatus not less than 75,000 lbs and shall provided with an approved surface so as to provide all weather driving capabilities.

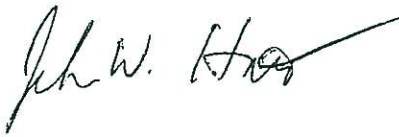
However, the fire authority would accept a reduced road width upon the installation of a fire hydrant located at the site entrance of parcel 141-230-33. Per County Fire Code Section 96.1.508.3, the fire hydrant flow shall be capable of delivering 2,500 GPM.

2. **Access** (APN: 141-210-24): The driveway (fire apparatus access road) leading from Palm Canyon Drive to the project site entrance shall have an unobstructed improved driveway entrance width of not less than 24' graded road width with a decomposed granite 20' improved surface. Fire apparatus access roads shall be designed and maintained to support the imposed load of fire apparatus not less than 75,000 lbs and shall provided with an approved surface so as to provide all weather driving capabilities.
3. **Gates:** Any gates, new or existing, must meet County Fire Code Section 96.1.503.6 for automatic operation with battery back up. Gates must open immediately upon emergency vehicle strobe light activation from either direction of approach. Gates must open for vehicles moving in the direction of egress

(leaving the property) when the vehicle approaches it. Gates must open on AC power failure. Gate installation must include Knox key-operated switch.

4. No Fire clearing or defensible space is proposed for this project.

Respectfully,

A handwritten signature in black ink, appearing to read "John W. Hardcastle", with a long, sweeping horizontal stroke extending to the right.

John W. Hardcastle

Fire Chief



COUNTY OF SAN DIEGO
DEPT. OF PLANNING & LAND USE
5201 RUFFIN ROAD, SUITE B
SAN DIEGO, CA 92123-1666
(858) 565-5981 • (888) 267-8770

PROJECT FACILITY AVAILABILITY FORM

FIRE

F

Please type or use pen

SEE ATTACHED

Owner's Name _____ Phone _____
Owner's Mailing Address _____ Street _____
City _____ State _____ Zip _____

ORG _____
ACCT _____
ACT _____
TASK _____
DATE _____

AMT \$ _____

DISTRICT CASHIER'S USE ONLY

SECTION 1. PROJECT DESCRIPTION

TO BE COMPLETED BY APPLICANT

- A. ☐ Major Subdivision (TM) ☐ Specific Plan or Specific Plan Amendment
☐ Minor Subdivision (TPM) ☐ Certificate of Compliance: _____
☐ Boundary Adjustment
☐ Rezone (Reclassification) from _____ to _____ zone.
☒ Major Use Permit (MUP), purpose: PV SOLAR FARM
☐ Time Extension... Case No. _____
☐ Expired Map... Case No. _____
☐ Other _____

Assessor's Parcel Number(s)
(Add extra if necessary)

1	4	1	2	1	0	2	4
1	4	1	2	3	0	2	6
1	4	1	2	3	0	2	3 (port.)

- B. ☐ Residential Total number of dwelling units _____
☐ Commercial Gross floor area _____
☐ Industrial Gross floor area _____
☒ Other Gross floor area _____

C. Total Project acreage +/-347 Total lots 3 Smallest proposed lot N/A

Thomas Bros. Page 1058 Grid F-1/G-1
PALM CANYON NEAR BORREGO VALLEY ROAD
Project address _____ Street _____
BORREGO SPRINGS 92004
Community Planning Area/Subregion _____ Zip _____

OWNER/APPLICANT AGREES TO COMPLETE ALL CONDITIONS REQUIRED BY THE DISTRICT.

Applicant's Signature: _____ Date: 7/20/09
Address: 9755 CLAIREMONT MESA BL., SUITE 100, SAN DIEGO, CA 92124 Phone: (858) 614-5059

(On completion of above, present to the district that provides fire protection to complete Section 2 and 3 below.)

SECTION 2: FACILITY AVAILABILITY

TO BE COMPLETED BY DISTRICT

District name BORREGO SPRINGS FIRE PROTECTION DISTRICT
Indicate the location and distance of the primary fire station that will serve the proposed project: 2324 STIRRUP ROAD
2.5 MILES

- A. ☒ Project is in the District and eligible for service.
☐ Project is not in the District but is within its Sphere of Influence boundary, owner must apply for annexation.
☐ Project is not in the District and not within its Sphere of Influence boundary.
☐ Project is not located entirely within the District and a potential boundary issue exists with the _____ District.
B. ☒ Based on the capacity and capability of the District's existing and planned facilities, fire protection facilities are currently adequate or will be adequate to serve the proposed project. The expected emergency travel time to the proposed project is _____ minutes.
☐ Fire protection facilities are not expected to be adequate to serve the proposed development within the next five years.
C. ☐ District conditions are attached. Number of sheets attached: _____
☐ District will submit conditions at a later date.

SECTION 3. FUELBREAK REQUIREMENTS

Note: The fuelbreak requirements prescribed by the fire district for the proposed project do not authorize any clearing prior to project approval by the Department of Planning and Land Use.

- ☐ Within the proposed project _____ feet of clearing will be required around all structures.
☐ The proposed project is located in a hazardous wildland fire area, and additional fuelbreak requirements may apply. Environmental mitigation requirements should be coordinated with the fire district to ensure that these requirements will not pose fire hazards.

This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, unless a shorter expiration date is otherwise noted.

Authorized signature: _____ JOHN W. HARDCASTLE FIRE CHIEF (660) 767-5436 7/20/09
Print name and title Phone Date

On completion of Section 2 and 3 by the District, applicant is to submit this form with application to:
Zoning Counter, Department of Planning and Land Use, 5201 Ruffin Road, Suite B, San Diego, CA 92123



COUNTY OF SAN DIEGO
DEPT. OF PLANNING & LAND USE
5201 RUFFIN ROAD, SUITE B
SAN DIEGO, CA 92123-1666
(858) 565-5981 • (888) 267-8770

PROJECT FACILITY AVAILABILITY FORM

WATER

W

Please type or use pen

SEE ATTACHED

Owner's Name _____ Phone _____

Owner's Mailing Address _____ Street _____

City _____ State _____ Zip _____

ORG _____

ACCT _____

ACT _____

TASK _____

DATE _____ AMT \$ _____

DISTRICT CASHIER'S USE ONLY

SECTION 1. PROJECT DESCRIPTION

TO BE COMPLETED BY APPLICANT

- A. ☐ Major Subdivision (TM) ☐ Specific Plan or Specific Plan Amendment
☐ Minor Subdivision (TPM) ☐ Certificate of Compliance: _____
☐ Boundary Adjustment
☐ Rezone (Reclassification) from _____ to _____ zone.
☒ Major Use Permit (MUP), purpose: PV SOLAR FARM
☐ Time Extension...Case No. _____
☐ Expired Map...Case No. _____
☐ Other _____

Assessor's Parcel Number(s)
(Add extra if necessary)

1	4	1
1	4	1
1	4	1

2	1	0
2	3	0
2	3	0

2	4
2	6
3	3 (port.)

- B. ☐ Residential Total number of dwelling units _____
☐ Commercial Gross floor area _____
☐ Industrial Gross floor area _____
☒ Other Gross floor area _____

- C. ☒ Total Project acreage +/-347 Total number of lots 3

- D. Is the project proposing the use of groundwater? ☐ Yes ☒ No
Is the project proposing the use of reclaimed water? ☐ Yes ☒ No

Thomas Bros. Page 1058 Grid F-1/G-1
Palm Canyon Drive near Borrego Valley Road
Project address _____ Street _____
Borrego Springs 92004
Community Planning Area/Subregion _____ Zip _____

Owner/Applicant agrees to pay all necessary construction costs, dedicate all district required easements to extend service to the project and
COMPLETE ALL CONDITIONS REQUIRED BY THE DISTRICT.

Applicant's Signature: _____

Date: 7/17/09

Address: 9755 CLAIREMONT MESA BL. SUITE 100, SAN DIEGO, CA 92124

Phone: (858) 614-5059

(On completion of above, present to the district that provides water protection to complete Section 2 below.)

SECTION 2: FACILITY AVAILABILITY

TO BE COMPLETED BY DISTRICT

District Name: Borrego Water District

Service area: ID-4

- A. ☒ Project is in the district.
☐ Project is not in the district but is within its Sphere of Influence boundary, owner must apply for annexation.
☐ Project is not in the district and is not within its Sphere of Influence boundary.
☐ The project is not located entirely within the district and a potential boundary issue exists with the _____ District.
- B. ☒ Facilities to serve the project ☒ ARE ☐ ARE NOT reasonably expected to be available within the next 5 years based on the capital facility plans of the district. Explain in space below or on attached _____. (Number of sheets)
☐ Project will not be served for the following reason(s): _____
- C. ☐ District conditions are attached. Number of sheets attached: _____
☐ District has specific water reclamation conditions which are attached. Number of sheets attached: _____
☒ District will submit conditions at a later date.
- D. ☒ How far will the pipeline(s) have to be extended to serve the project? 1100'

This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, unless a shorter expiration date is otherwise noted.

Authorized signature: _____

Print name: Richard Williamson

Print title: General Manager

Phone: 760/761-5800

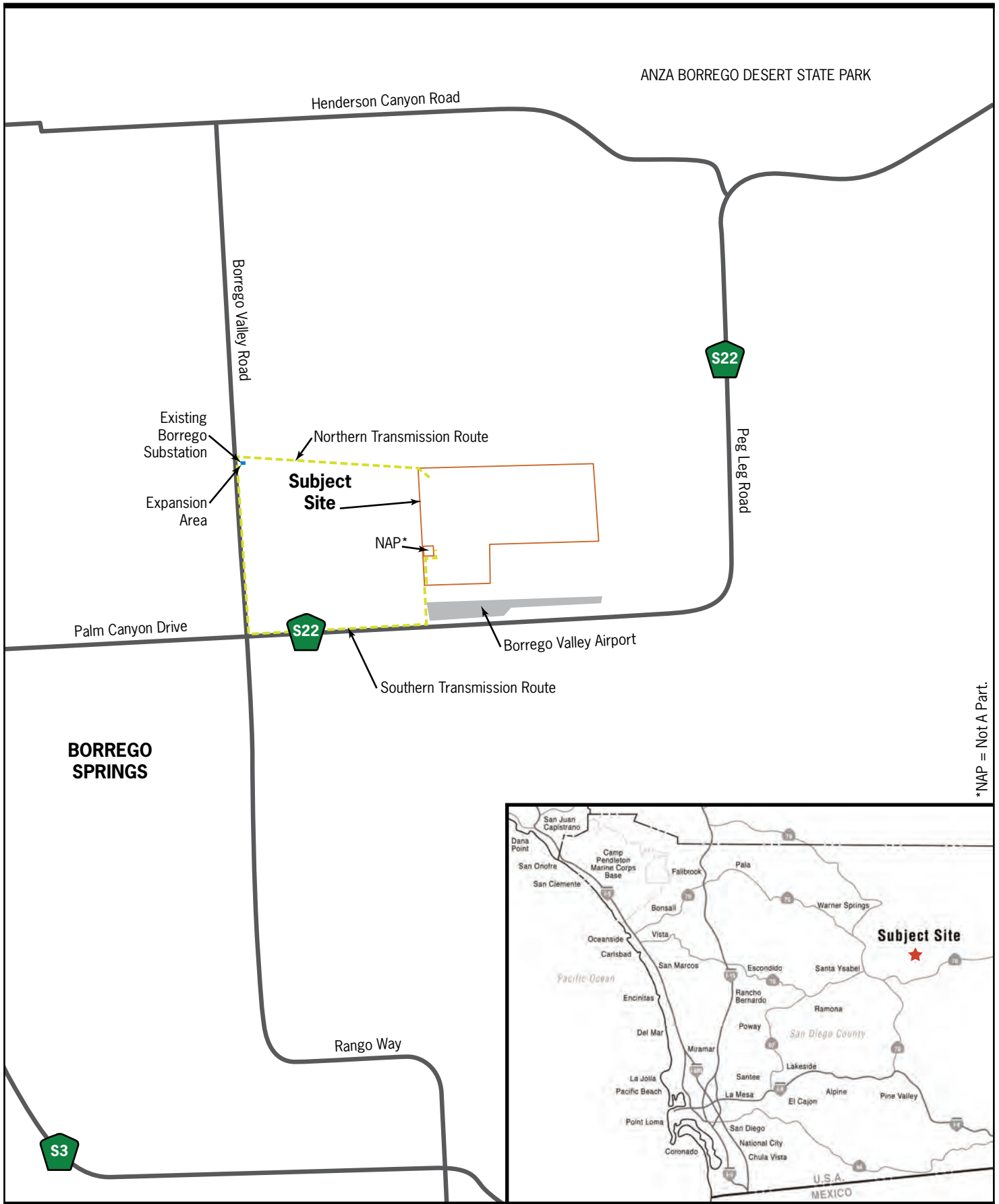
Date: 7/30/09

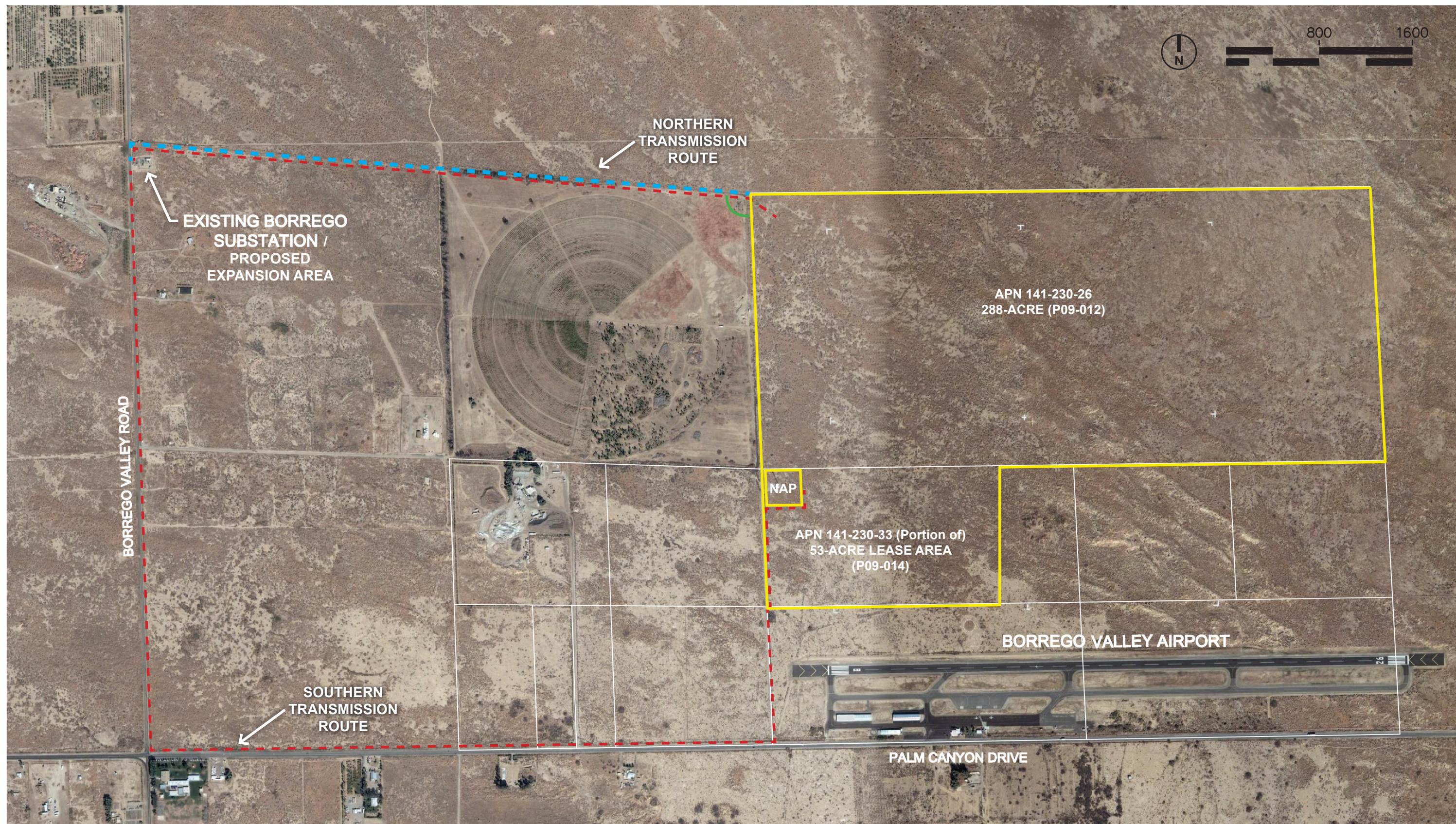
NOTE: THIS DOCUMENT IS NOT A COMMITMENT OF SERVICE OR FACILITIES BY THE DISTRICT

On completion of Section 2 by the district, applicant is to submit this form with application to:
Zoning Counter, Department of Planning and Land Use, 5201 Ruffin Road, San Diego, CA 92123



DPLU-399W (02/07)





Source: Eagle Aerial, 2008.